

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AUBRY MCMAHON,

Plaintiff,

vs.

WORLD VISION, INC.

Defendant.

CASE NO. 2:21-CV-00920-JLR

DECLARATION OF
SHANNON OSBORNE

Shannon Osborne declares:

1. I have personal knowledge of the facts stated in this declaration and am competent to testify to those facts.

2. I am the Director – Contact Center Operations at World Vision, Inc. (“World Vision” or “WV”) and have been so employed since January 4, 2012.

3. World Vision is a Christian ministry dedicated to spreading the gospel of Jesus Christ, primarily through humanitarian outreach to poor and underserved children and families around the world. It operates in many ways like a Christian

1 church and implements its programs through and as supported by local churches in
2 the United States and around the world.

3
4 4. The job posting for the role that Plaintiff Aubry McMahon sought at
5 World Vision would have required her to “Personify the ministry of World Vision by
6 witnessing to Christ and ministering to others through life, deed, word and sign [and
7 k]eep Christ central in our individual and corporate lives.” Attached to this
8 Declaration as Exhibit SO-01 is a true and correct copy of this Job Posting, 2020 (P0011-
9 20; P0072-77; WV0048-50).

10
11 5. My responsibilities include Managing the Quality Coach team,
12 Supervisor/Manager Team(s), Communications and Research in Donor Contact
13 Services (“DCS”).

14
15 6. DCS also can refer to “Donor/Customer Service,” as is typical in our
16 offer letters to prospective DCS representatives such as the Plaintiff Aubry McMahon.
17 See Offer Letter (WV0078-79; P0009-10). Attached to this Declaration as Exhibit SO-02
18 is a true and correct copy of this Offer Letter to Aubry McMahon dated January 5, 2021
19 (WV0078-79; P0009-10).

20
21 7. As used in this Declaration, “DCSR” means a DCS Representative (or a
22 “DSRT” while in Training). All these titles refer to the same role/career path at World
23 Vision.

24
25 8. I am personally familiar with all documents and media referenced in this
26 Declaration, all of which were provided to Plaintiff during discovery and bear a
27 “WV___” citation number (or in the few cases of Plaintiff’s production, a “P___”

1 citation number). I attest to the authenticity and accuracy of these documents and
2 media at appropriate places throughout this Declaration.

3
4 9. I daily work with and supervise DCS Quality Coaches, Communications,
5 Research and Managers/Supervisors and their Direct Reports in DCS, the World
6 Vision department that Aubry McMahon sought to join as a DCSR if she successfully
7 completed the 9 to 11 weeks of training and evaluation as a DSRT (trainee).

8
9 10. I have direct detailed personal knowledge of the day-to-day
10 responsibilities of DCSRs.

11 11. I confirm that the following statements of fact (in this paragraph), taken
12 from the court opinions in the *Spencer v. World Vision* litigation (2008-2011), have
13 remained true at all times of my World Vision tenure: World Vision's "overt
14 Christianity is especially evident to those applying for employment at World Vision"
15 because it permeates the World Vision workplace. It does so because World Vision
16 exists "only" to "spread" its "Christian faith" as "infallibl[y]" and "authoritative[ly]"
17 established by "the Bible." This faith dwells "at the heart of all" World Vision does,
18 including its "relief efforts," which "flow from [its] profound sense of religious
19 mission." Since World Vision "believes the key" to this mission "lies first in the hearts
20 and minds of [its] staff," its workforce consists "only [of] Christians for all positions."
21 From each member of this Christian workforce, World Vision requires a "commitment
22 to [this] shared faith [and] a common understanding of how that faith is lived out day-
23 to-day."
24
25
26
27

1 12. I also confirm that the following statements of fact (in this paragraph),
2 taken from the court opinions in the *Spencer v. World Vision* litigation, have remained
3 true at all times of my World Vision tenure:: All World Vision staff, including DCSRs,
4 are responsible for: (a) confessing they are committed Christians; (b) agreeing
5 “wholeheartedly” with World Vision’s core religious principles; (c) “communicating
6 [World Vision’s] Christian faith [and] witness,” which is “integrated [into] everything
7 [it] does,” “accurately and with integrity”; and (d) participating “regularly” in “prayer
8 activities, devotionals, and weekly chapel services.” A core job responsibility of all staff
9 is prayer, which “is a component of [World Vision’s] work.” To begin each work year,
10 “an entire work day is set aside each year for prayer,” which all staff must attend.
11

12 13. World Vision’s annual Day of Prayer (“DOP”), which marks the
13 beginning of each fiscal year in October, is a unique role for all our staff in our uniquely
14 Christian ministry. DOP 2020 occurred remotely on October 1, 2020, eight weeks
15 before Aubry McMahon applied to join our Christian ministry. A key theme for DOP
16 2020 was seeking God’s Kingdom *first*, as required by Scripture. Attached to this
17 Declaration as Exhibit SO-03 is a true and correct copy of an October 1, 2020 Email
18 from the World Vision Faith at Work Manager for DOP 2020 and the related
19 PowerPoint slides and “2020 Master Showflow” script materials for DOP 2020
20 (WV1772-1817).
21

22 14. These DOP 2020 materials provide a few (of many) examples that prayer
23 is a core “component of [World Vision’s] work” and a core job responsibility of all WV
24 staff. They illustrate that a core job responsibility of DCSRs is praying for and with the
25
26
27

1 persons with whom they talk. “[This coming year] we must ‘seek first the kingdom [of
2 God]’ through prayer.” DOP 2020, at 5 (WV1778). “Key Goals [include] praying for
3 our work, our donors and our staff.” *Id.* at 4. “[Expect your] unique packet of donor
4 prayer requests.” Faith at Work Manager (WV1772). “Have that document handy for
5 the Donor Prayer Request session!” *Id.* at 1773. “Well, we’ve arrived at one of the most
6 treasured parts of our day—Donor Prayer Requests. [W]e have the great honor of
7 praying for our donors. [P]lease be sure that you honor them by praying for each one.”
8 DOP 2020 Script at 11:43 (WV1805). *See id.* at 11:46 (20-minute Donor Prayer Request
9 Video). “It never ceases to amaze me how faithful God’s people are even when they
10 may be facing many difficulties in their own life. I just feel honored to have a small
11 part in their faith journey.” *Id.* at 12:31. *See also id.* at 1:36 (President’s Address).

12
13
14
15 15. Prayer is critical to World Vision’s ministry. All World Vision staff,
16 including DCSRs, are responsible for participating in and helping to foster a “Prayer-
17 Centered Work Environment,” as stated in our Orange Book: Living Out Our Values,
18 11 (WV718). Attached to this Declaration as Exhibit SO-04 is a true and correct copy of
19 this World Vision Orange Book: Living Out Our Values (WV0708-0730). “Prayer plays
20 a central role in [World Vision’s mission, which] is not only commanded by God but
21 also resourced by Him.” (WV718). Thus, staff are encouraged to “begin and end [each]
22 meeting in prayer.” *Id.* “With God’s Help, we will [p]ray, pray again, and pray some
23 more.” Core Values: We Are Christian (WV0740, 4700). Attached to this Declaration as
24 Exhibit SO-05 is a true and correct copy of this World Vision Core Values: We Are
25 Christian presentation document (WV0738-0752).
26
27

1 16. Prayer is pivotal for many reasons at World Vision. The following
2 statements of fact (in this paragraph) accurately reflect World Vision's policies,
3 expectations, and beliefs during my tenure at World Vision. Prayer unquestionably
4 constitutes the exercise of religion at World Vision. It is plainly part of World Vision's
5 religious worship and integral to its free exercise. Like all religious exercise, prayer
6 begins with religious beliefs held inwardly and secretly. But it does not stop there.
7 World Vision, like many of America's founders, has faith in the power of prayer –
8 including prayer that is silent, aloud, private, and corporate – to release the power and
9 Providence of God. Partly for that reason, World Vision believes the guarantee of
10 religious freedom does perhaps its most important work by protecting the ability of
11 those who hold religious beliefs of all kinds to live out their faiths in daily life through
12 the performance of (or abstention from) physical acts.
13
14
15

16 17. All the above is expected of all World Vision staff, but is uniquely
17 expected of DCSRs, who serve as World Vision's "voice, face, and heart." This is why
18 9-11 weeks of training are required to join DCS. As stated in her offer letter, Aubry
19 McMahon would have had to pass 9-11 weeks of such "training and evaluation" in
20 order to join the DCS team. *See* Offer Letter, Exhibit SO-02 (WV0078-79; P0009-10).
21

22 18. There are many good reasons for these rigorous religious requirements
23 for the DCSR role.
24

25 19. The DCS "Mission Statement" begins, "*Consumed and called by Jesus*
26 *Christ.*" Donor Contact Services: DCS Policies, 5 (WV425). "Being a part of DCS means
27 you are the *Voice, Face* and *Heart* of World Vision." *Id.* Attached to this Declaration

1 as Exhibit SO-07 is a true and correct copy of this World Vision Donor Contact Services:
2 DCS Policies document (WV0421-0429).

3
4 20. "Expectations in DCS [include:] Attend & participate in Devos and
5 Chapel—part of your workday, an essential function of your job. You are the face of
6 WV and play an invaluable role!" DSRT Training: HR Introduction, 1 (WV0430). "Key
7 policies [include] Standards of Christian Ethics and Business Conduct—Appropriate
8 behavior in/out of the workplace[.]" *Id.* at 2 (WV0431). Attached to this Declaration
9 as Exhibit SO-08 is a true and correct copy of this World Vision Donor DSRT Training:
10 HR Introduction document (WV0430-0433).

11
12 21. As part of their DCSR training, DCSRs trainees are quizzed on their
13 ability to recognize the correct DCS Mission Statement. WV5269 (New Employee
14 Orientation quiz) ("Which of the following is the correct DCS Mission Statement?").
15 Attached to this Declaration as Exhibit SO-09 is a true and correct copy of this New
16 Employee Orientation Quiz (WV5264-5269).

17
18 22. According to the job posting for Aubry McMahon's role, which she read
19 and responded to, she would be required to do the following: "Help carry out our
20 Christian organization's mission, vision, and strategies. Personify the ministry of
21 World Vision by witnessing to Christ and ministering to others through life, deed,
22 word and sign. [K]eep Christ central in our individual and corporate lives. Attend and
23 participate in the leadership of devotions, weekly Chapel services, and regular
24 prayer." Job Posting, 2020, Exh. SO-01 (P0011-20, P0072-77; WV0048-50).

23. As a DCSR, Aubry McMahon would interact all day with the ministry's donors, its lifeblood, striving to be "sensitive to [their] needs and pray[ing] with them." *Id.* Transformation of donors is just as vital to World Vision as that of the children they sponsor. Why Focus on Donor Transformation? (WV2805-12) (so that they may "experience Jesus Christ's transforming love, grace, and power"). Variations of the word "transform" appear throughout World Vision documents concerning donors. Attached to this Declaration as Exhibit SO-10 is a true and correct copy of this Why Focus on Donor Transformation? document (WV2805-12).

24. As a DCSR, Aubry McMahon would be a "crucial member" of the DCS team and "key liaison and 'voice of World Vision.'" Job Posting, 2022 (WV184).¹ She would need to carry out her role "persuasively and convincingly," DSRT Job Description (WV181), requiring her to believe it and live it—all of it. In summary, her job did, and would have continued to, include important ministerial duties. Attached to this Declaration as Exhibit SO-11 is a true and correct copy of this Job Posting, 2022 (WV0180-0188).

25. These ministerial duties of a DCSR are traditional Christian ones, as shown by the five companywide chapel services led by DCS produced in discovery. These include the DCS-led chapel services on June 11, 2008; September 1, 2010; January 22, 2013; June 26, 2019; and August 4, 2021. Each lasts up to an hour.

¹ These phrases are from the job posting for a DSRT "class" in 2022, but they describe accurately the role that McMahon sought in 2020, consistently with the job posting for her DSRT class. See Job Posting, 2020 (P0011-20; P0072-77; WV0048-50).

1 26. I am personally familiar with DCS-led services and have participated in
2 preparing, attending, and implementing them since I joined DCS in January of 2012,
3 including, specifically, attending the DCS-led chapel service on January 22, 2013, and
4 preparing, attending, and implementing the DCS-led chapel services on June 26, 2019,
5 and August 4, 2021. True and correct video recordings of these three DCS-led
6 companywide chapel service are being filed with this Declaration as Exhibits SO-12,
7 SO-13, and SO-14.
8

9
10 27. I co-organized, attended, and opened the June 26, 2019 chapel service. I
11 also recently viewed the entire video recording of this service. It is representative of
12 DCS-led chapel services during my tenure at World Vision. This June 26, 2019 chapel
13 service timely portrays the environment and role that Aubry McMahon sought to join
14 in 2020.
15

16 28. DCS opened this service with prayer and Bible reading (0:07-5:04)
17 followed by DCSR messages (5:05-9:35), praise and worship time (9:36-20:45), DCSR
18 testimonials (20:46-23:26), DCSR panel discussion (23:27-48:26), more testimonials
19 (48:28-50:44), and closing prayer (50:45-53:05). Transcriptions of some excerpts from
20 this chapel service are provided below and speak for themselves.
21

22 29. “[G]od brought us here [to DCS] to be the voice, face, and heart of World
23 Vision [to serve] our donors in the name of Jesus.... In the last year, donors called us
24 over 210,000 times. We also called them over 100,000 times ... and ministered to our
25 donors through prayer. [We] replied to 51,000 emails and letters and prayed for nearly
26 10,000 prayer requests.” (6:04-6:37)
27

1 30. “I have been in call centers for 11 years, but nothing prepares you for
2 [the] prayer requests. One man said his sister-in-law passed away that very morning.
3 Several women just lost their husbands. Many people have health and financial issues.
4 However, the Lord cares for each one. I am grateful and blessed for a chance to tell
5 them how good the Lord is. I’m grateful they trust me to share, and I’m blessed by
6 how much appreciation and love they give to myself and World Vision[.]” (22:00-
7 22:30) (Video testimonial by a DCSR).

8
9
10 31. During the panel discussion, the moderator asked this question: “How
11 has working [in] DCS impacted your faith and walk with Christ?” Below are some of
12 the responses from DCSRs. “So, from Day One, I’ve always felt like working in DCS
13 [really] puts us on the front lines of World Vision. [We] openly discuss our stories, give
14 our testimonies, both to each other as friends, coworkers, and also to donors and have
15 them share their testimonies with us. [It] has been an incredible way to witness Christ
16 and everything that he’s done for us as people, as an organization, and for our donors.”
17 (24:35-25:29) “Fellowship that we have with coworkers and donors, it’s so amazing.
18 We’re praying with each other. We’re praying with the donors.” (27:26-27:33) “[I]t’s a
19 calling to come to World Vision [where we] actually pray for people all over the world
20 when we answer [the phone] and ask, Can I pray for you? And the requests are just
21 amazing. And then God gets to use us in a mighty way to pray for our donors[.] When
22 you work in a place that’s also a ministry, it just opens this fire for Jesus within you.”
23 (27:51-28:49) “[I] believe the Lord placed me [here for most] of the last decade [and]
24 simply remind[s] me to look around and see his faithfulness[.] To see it in our donors
25
26
27

1 [and] in the countless stories of redemption that we hear from around the world. We
2 have opportunity to pray with our donors, as you have heard from most every
3 testimony from DCS today. We have opportunity to pray for one another and we have
4 the opportunity to pray together for those who have experienced devastation[.]”
5 (29:47-30:49)
6

7 32. So, DCS is no common call center. “[I]n prayer, the donors share so many
8 things with us, as you’ve heard already. One family called [after a] terrible car
9 accident[. T]he mother and the son were injured very badly, and they called us for
10 prayer. Well, four months later, they called us back [and] were just in joy. They were
11 healed [and] really believed that our prayers for them helped them heal [and] put their
12 lives back together, and they just couldn’t wait to share [what] God had done in their
13 lives. So, God is everywhere in our work and he’s in our donors[.]” (39:16-39:58)
14
15

16 33. DCSRs explained their personal “ministry” to World Vision’s ministry
17 in various but interconnected ways. “[Talking to donors is] an opportunity to share
18 what’s on our hearts and to be a mouthpiece for our ministry.” (40:45-40:54) “I’m glad
19 I get to be the mouthpiece[.] I know that by opening up my mouth and allowing for
20 the Holy Spirit to flow like living water, this allows room for the donor to know more
21 about how they can actually help[.] Now, not everyone can actually give, but [the]
22 Lord puts a calling in each and everybody’s heart, and how they can serve. [I] also take
23 mental notes [from] our chapels and glean information that may be useful for when
24 I’m talking to the donors. Next, I pour out my heart to every [caller] because we just
25 don’t know [what they are] going through[.]” (41:02-42:30) “I love sharing World
26
27

1 Vision's needs [with] our donors[. They] just love World Vision [and] I always [tell]
2 them what our need is. [They can] lift our need in prayer and if they are able [to
3 donate]. I thank them whether it's monetary or prayer. And at this time I usually hear
4 lovely stories of how God has called them to be prayer warriors or intercessor[s] and
5 it's [a]mazing to be able to open my mouth and allow for the Holy Spirit to work."
6
7 (42:46-43:42)

8
9 34. When DCSRs visit World Vision field offices around the world, they
10 often experience what they as Christians view as taking their place in the Body of
11 Christ. "[I] had the life changing opportunity, like many of [us in DCS] have had, to
12 visit our colleagues in Kenya. [Our] staff in the field [say] how thankful they are—and
13 the heroes we are to the children. [And] we protest and say, How can you say that:
14 you are the heroes; [you are] literally serving the children. And they say, But we
15 wouldn't be able to do any of that work if you weren't sending gifts halfway around
16 the [world]. And we say, But we wouldn't have anything to ask for if it wasn't for [the]
17 incredible things [you are doing] with those funds. And they say, But we wouldn't be
18 able to do anything if not for your generous donors. And we say, But you are the hands
19 and feet of this organization. [And] they say, But you are the ears and mouths of this
20 organization. And *that* is what it looks like for World Vision to be the body of Christ."
21
22 (46:53-48:05)

23
24 35. "Being in DCS has been a faith-building experience because you can see
25 God moving everywhere you look, from the obvious events in the field to the miracles
26 of every day.... The miraculous is part of our culture and something that gives us hope
27

1 daily.” (48:26-48:51) “Working in DCS has impacted my faith [and] I’m constantly
2 reminded of the privilege I have to be the voice for those who are unable to speak up
3 for themselves [whom] we serve in Christ.” (50:27-40)
4

5 36. Anthony Williams, the Director of DCS (at that time and now), closed
6 this “DCS Chapel,” referencing *Luke* 9:48 and 19:17. “We represent each one of you as
7 we provide the highest level of service [to] our donors. But most of all, we obey God’s
8 calling to be the voice for the children, the families, that we care so much about. In my
9 14 and half years here, there has never been a day ... that I didn’t know why God called
10 me to this place. [And when] that day comes [and] each of you is standing before
11 [God], I pray that He looks at each one of you in your faces and says, Well done, good
12 and faithful servant: you did *exactly* what I asked you to do. I will now close us in
13 prayer” (51:14-52:21)
14
15

16 37. As a DCSR, Aubry McMahon’s responsibilities would have included
17 praying faithfully with donors, as illustrated by ten representative donor calls from
18 the year 2020. True and correct audio recordings of these DCSR donor calls are being
19 filed with this Declaration as Exhibit SO-15. *See* 2020Call1–2020Call10 (private info
20 redacted). These ten samples reflect the more than 15,000 prayer requests recorded
21 during calendar year 2020.
22

23 38. In each of these 2020 calls, DCSRs prayed with donors about their needs
24 and the needs of the children they sponsor. These donor needs included an elderly
25 man’s constant pain, a wife’s kidney infection, a mother’s biopsy, a recent widow’s
26 troubled daughter, a father’s broken hip, a husband’s safety as a doctor responding to
27

1 Covid, a brother-in-law's wife going to hospice, a family dairy farm's fate, a church's
 2 desire to rebuild its youth ministry, and an emotional young woman "really worried
 3 that I'm going to lose my job."
 4

5 39. Here is one example with a female donor, in April 2020, early into the
 6 COVID-19 pandemic:

7 **Donor:** "My uncle ... contracted the virus [and my mom] had to make
 8 the decision today to remove life support. So, please pray for my mom.
 9 [I]t's her big brother [and] it was sudden.... [I]f you guys could pray for
 10 my mom, I'd appreciate that very much."

11 **DCSR:** "[I]f you're comfortable, would you be okay if I prayed right now
 12 over the phone?"

13 **Donor:** "Yes. Definitely. That would be great."

14 **DCSR:** "Dear Lord, I just want to lift up [donor] and her family as well
 15 as her uncle specifically.... I pray for comfort and for healing for the
 16 family, specifically for [her] mother as she goes through this time with
 17 her big brother.... [W]e pray for comfort and for support for this entire
 18 family.... So, thank you so much for your comfort, dear Lord, and we
 19 thank you for loving us, in Jesus' name. Amen."

20 **Donor:** "Amen. Thank you so much for that. I really appreciate that.
 21 Thank you."

22 **DCSR:** "Of course. And ... don't hesitate to give us a call.... to reach out
 23 Okay?"

24 **Donor:** "Okay. Thank you so much. And I really – I really appreciate you
 25 calling. It was really well timed. So, thank you." [DCS Prayer Call, April
 26 1, 2020, at 0:53-3:50.]
 27

40. The following representative examples of encouraging "shout outs"
 from DCS managers to their staff also show how important prayer is to the work of
 DCSRs. See WV3103-10 (donor identifying information redacted). "Mr. [Donor was]
 overwhelmed when he shared [that female DCSR] prayed for him and showed him
 the love of the Lord on their phone call amidst his own personal trials he shared with
 her. He said he has never had such an amazing experience with an organization."

1 WV3103. "Michael [Donor] was blown away [by DCSR, who] offered prayer [that]
 2 deeply touched [him.] Thank you [DCSR] for reminding donors we are a ministry
 3 ready to be God's hands and feet!" *Id.* at 3105. "Ms. [Donor called] leadership this
 4 morning to share [her] incredible [call with DCSR, who] prayed the most beautiful
 5 prayer over [her,] straight from the heart of Jesus." *Id.* at 3106. "Mrs. [Donor said she]
 6 was touched by [DCSR's] prayer [and] is incredibly thankful for [our] ministry." *Id.* at
 7 3107. Attached to this Declaration as Exhibit SO-16 are true and correct copies of these
 8 DCS manager "shout outs" to DCSRs (WV3103-3110) (donor identifying information
 9 redacted).

12 41. The sample shout-outs continue as follows. "Susanna [Donor] wanted us
 13 to know how amazing [DCSR] is. She said [he] was compassionate, kind and so very
 14 caring. As she [described] how [he prayed] for her she got choked up and started to
 15 cry.... This [is] pure ministry [and] you understand what is truly important." *Id.* at
 16 3108-09. "Mrs. [Donor called] to say: '[female DCSR] was amazing [and such] a
 17 blessing today for me because I asked for prayer and [she] encourage[d] me and lifted
 18 me to the Lord and I feel amazing. She is a beautiful human being and she praises
 19 GOD! She is in the *right position*.'" *Id.* at 3110 (emphasis added). "Mrs. [Donor] called
 20 to [commend DCSR for praying for her] daughter [which] touched [her] heart. She said
 21 she believes [in] World Vision [and that DCSR] is in the *right place* in the kingdom of
 22 God." *Id.* at 3112 (emphasis added).

26 42. As detailed above, Aubry McMahon, to be qualified as a DCSR, would
 27 need to fit the DCSR's ministerial role and duties in many ways. First, she would need

1 to be a “key” “messenger” and “voice of World Vision.” Second, she would need to
2 “personify its ministry” to its lifeblood of donors. Third, she would need to support
3 donor transformation via “Christ’s transforming love, grace, and power.” Fourth, she
4 would need to combine with likeminded colleagues to be “God’s hands and feet” in
5 the “body of Christ.” Fifth, she would need to perform “ministry” through outbound
6 and inbound calls being able to explain World Vision’s ministry, its programs and how
7 World Vision witnesses to Christ in its work and through fundraising itself.
8
9

10 43. As part of our Christian faith, World Vision understands the activity of
11 fundraising and the role of the DCS staff in fundraising to be not only part of World
12 Vision’s ministry but also a form of ministry in itself. “Done right, fund-raising is
13 ministry,” Christian Witness/Ministry of Fundraising, ¶4.1 (WV1363), just “as
14 spiritual as giving a sermon, entering a time of prayer, visiting the sick, or feeding the
15 hungry.” *Id.* This tenet of fundraising-as-ministry is reinforced by twenty-six slides
16 included as part of World Vision’s Christian Witness Immersion Program materials.
17 *See id.* (WV1361-87). Attached to this Declaration as Exhibit SO-17 is a true and correct
18 copy of this Christian Witness/Ministry of Fundraising document (WV1360-1388).
19
20

21 44. This tenet of fundraising-as-ministry is also illustrated throughout
22 World Vision’s donor-focused materials. *See, e.g.,* Reflections on Marketing &
23 Fundraising (WV1515-56); Why Focus on Donor Transformation? (WV2805-12).
24 Attached to this Declaration as Exhibit SO-18 are true and correct copies of these donor
25 transformation and fundraising materials (WV1515-1556; WV2805-2812).
26
27

1 45. As explained above, all these ministry activities need to be performed
2 daily by DCSRs “convincingly” to advance the Christian “mission, vision, and
3 strategies” of World Vision. All day they must speak with donors and colleagues amid
4 opportunities to “[p]ray, pray again, and pray some more,” seeking God’s power and
5 blessings on World Vision, its donors, and its programs, as “resourced by Him.”
6 Orange Book: Living Out Our Values, Exh. SO-04, 11 (WV0718).
7

8 46. The latter point is essential, because prayer moves God’s hand. As
9 explained in our Orange Book: “**A PRAYER-CENTERED WORK ENVIRONMENT.**
10 Prayer plays a central role in World Vision’s ministry. We recognize that our mission
11 is not only commanded by God but also resourced by God. We place such a high value
12 on prayer that we begin each fiscal year with an entire day dedicated to prayer,
13 thanksgiving, and reflection. In addition, we provide prayer rooms with special
14 emphases throughout the year and encourage employees to begin and end each work
15 or project meeting in prayer.” *Id.*
16
17

18 47. We pray for God’s help to meet donor needs and facilitate their
19 transformation. We pray for God’s help to meet the physical, emotional, and spiritual
20 needs of the children and families the donors sponsor. Most of all, we pray to advance
21 God’s kingdom through our Lord and Savior Jesus Christ. None of these goals are
22 achievable through purely earthly powers or means. World Vision believes God, and
23 His Word, and believes in the power of prayer described in God’s Word. That is why:
24 “With God’s Help, we will: ... Pray, pray again, and pray some more.” Core Values:
25 We Are Christian (citing Scriptures), Exh. SO-05 (WV0740).
26
27

1 48. To perform the role described in detail above, Aubry McMahon would
2 need to believe it, and live it, each day, in both her professional and personal lives.

3 49. The DCSR role is not just about fundraising (as vital as that is). In the
4 words of the courts in *Spencer*, a primary goal of World Vision is to promote the “child
5 sponsorship program” that “pair[s]” donors with children; some of these donors may
6 wish to “learn about the Christian faith.”
7

8 50. The DCSR role is not just about the children (as vital as they are). DCSRs
9 support donor transformation, by inspiring those donors who share World Vision’s
10 faith and by sharing that faith with those who don’t.

11 51. The DCSR role is not just about the donors. DCSRs grow World Vision’s
12 ministry by sharing its mission, vision, and strategies.
13

14 52. The DCSR role is not just about World Vision’s programs. DCSRs are to
15 be likeminded colleagues and witnesses to Jesus Christ at work and elsewhere.
16

17 53. The DCSR role, most importantly, is not just about this world. DCSRs
18 play a key role fulfilling World Vision’s core purpose of advancing by all means “the
19 Gospel [of] Jesus Christ.”
20

21 54. The DCSR role, the one sought by Aubry McMahon, is about all of these
22 things. Ms. McMahon would have needed to further the goal that “[e]very current and
23 potential donor and partner will clearly understand our mission to bear witness to
24 Jesus Christ—through life, deed, word, and sign—in ways that encourage people to
25 respond to the gospel of Jesus Christ.” WV Christian Witness Messaging (WV1125).
26
27

1 Attached to this Declaration as Exhibit SO-19 are true and correct copies of these WV
 2 Christian Witness Messaging materials (WV1124-1141).

3 55. World Vision can accomplish its Christian mission only to the extent it
 4 remains free to determine which hires fill the "right position" or "right place" in its
 5 Christian ministry.
 6

7 56. In my view, there is no World Vision without: (a) the donors (most of
 8 whom share its faith and thus sponsor, pray for, write to, and sustain the children out
 9 of common purpose); (b) the children (many of whom learn about this faith); and (c)
 10 the staff (whose shared faith kindles internal synergies and garners God's providence).
 11

12 57. In the role that she sought, Aubry McMahon was to "personify," be a
 13 "voice" for, and be a "messenger" for World Vision's faith. That role required her
 14 wholehearted assent—sharing World Vision's faith—to perform and promote it
 15 "accurately and with integrity," "persuasively and convincingly," to donors,
 16 supporters, colleagues, and the public. She was to "live[it] out day-to-day." Those
 17 were her responsibilities. They were religious. They were important. And they were
 18 key to World Vision's mission.
 19
 20

21 I declare under penalty of perjury under the laws of the State of Washington
 22 that the foregoing is true and correct.

23 SIGNED this 6th day of April, 2023, at Seattle, Washington.

24
 25 
 26 SHANNON OSBORNE
 27